

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

NAPOLEÓN SEPÚLVEDA MORENO, §  
and LUZ MARIA MARTINEZ CASTRO, §  
and SANDRA LIZETTE CARDENAS §  
RAMIREZ, as Next Friend of §  
S.S.C., minor child, §  
Individually and for and on behalf of §  
All Those Who Are Entitled To Recover §  
Under The Texas Wrongful Death §  
and Survival Acts for the Death of §  
JESUS IVAN SEPÚLVEDA MARTINEZ, §  
and BRENDA BERENICE CASIAS §  
CARRILLO, §

*Plaintiffs,* §

v. §

LASALLE CORRECTIONS V LLC, §

*Defendant.* §

NO. 3:24-CV-00059-DB

**PLAINTIFFS' SECOND AMENDED EXHIBIT LIST**

TO THE HONORABLE DAVID BRIONES, SENIOR UNITED STATES DISTRICT JUDGE:

COME NOW Plaintiffs, NAPOLEON SEPÚLVEDA MORENO, LUZ MARIA MARTINEZ CASTRO, SANDRA LIZETTE CARDENAS RAMIREZ, as Next Friend of S.S.C., minor child, and BRENDA BERENICE CASIAS CARRILLO in the above-entitled and captioned cause and pursuant to Local Rule CV-16(f)(4):

**FIRST AMENDED EXHIBIT LIST**

**WILL USE**

No.	Description	Offer	Object	Date	
				Admit	Deny
P-1	Emerald Job Description (LaSalle 25)				
P-2	LaSalle Job Description (LaSalle 173-174)				
P-3	PAF for LaSalle (LaSalle 96-97)				

P-4	September 13, 2022, County Meeting Agenda and Minutes (Plaintiffs 1934-1940, 1792-1832, 2067-2077)				
P-5	County IGSA Amendment and DOWQ from County (Plaintiffs 1934-1940, 2126-2130)				
P-6	HCWCID #1 Agendas and Minutes (Plaintiffs 1531-1532, 1547, 1537-1538, 1535-1536, 1556-1558, 1543-1544, 1576-1577, 2172-2197, 2205-2206, 2251)				
P-7	September 13, 2022 Correspondence (LaSalle 320-322)				
P-8	Texas A&M Report (Exhibit 11 of 30b6 Deposition)				
P-9	Photo of 717 Wilson (Exhibit 2 of Sheppard Deposition)				
P-10	Photos of Jesus Sepulveda Martinez and Family (Plaintiffs 1739-1758)				
P-11	Photos of Casias Carrillo's family (Plaintiffs 1706-1707)				
P-12	FBI Crime Scene Photos ( <b>Sealed, Court Custody</b> )			7/16/2025 <sup>1</sup>	
P-13	S2.P3 Vehicle photographs 2024-10-24 12.07.19 Vehicle ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-14	Fragments of shotgun shell, ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-15	FBI Vehicle Photos 1 2024-10-24 12.12.07 ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-16	Wilson 2 & 3 Log video ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-17	Wilson 4 Log ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-18	S10 Drone Footage ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-19	Aerial Footage ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-20	MSheppard interview ( <b>Sealed, Court Custody</b> )			7/16/2025	
P-21	Booking Photo of Michael and Mark Sheppard ( <a href="https://kfoxtv.com/news/local/gallery/twin-brothers-mark-and-mike-sheppard-appear-for-bond-hearing-sierra-blanca?photo=1">https://kfoxtv.com/news/local/gallery/twin-brothers-mark-and-mike-sheppard-appear-for-bond-hearing-sierra-blanca?photo=1</a> )				

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<sup>1</sup> See, [ECF No. 98] for admission of all items listed as admitted on July 16, 2025.

**MAY USE**

No.	Description	Offer	Object	Date	
				Admit	Deny
P-22	ECF No. 45-1 ( <b>Sealed</b> )			7/16/2025	
P-23	ECF No. 45-2 ( <b>Sealed</b> )			7/16/2025	
P-24	ECF No. 45-3 (pages 1-7) ( <b>Sealed</b> )			7/16/2025	
P-25	ECF No. 45-4 ( <b>Sealed</b> )			7/16/2025	
P-26	ECF No. 45-6 ( <b>Sealed</b> )			7/16/2025	
P-27	ECF No. 45-7( <b>Sealed</b> )			7/16/2025	
P-28	Audio from Plaintiff Casias Carrillo (Plaintiffs 1708, 1709, 1710)				
P-29	FPBDS Standards (www.usmarshals.gov/prisoner/detention-standards.htm)				
P-30	Plaintiff Casias Carrillo Del Sol Records (Plaintiffs 53-74, 79-83, 89-114, 115-120, 131-135, 145-163, 289-302, 316-317, 318-320, 357-360, 572-577, 870-877)				
P-31	Plaintiff Casias Carrillo University Medical Center Records (Plaintiffs 885, 887-898, 1252-1265, 1275-1278, 1290-1292, 1296-1301)				
P-32	Birth Certificates/Actas de Nacimiento (Plaintiffs 1712, 1713, 1717)				
P-33	HCWCID #1 Budget (Plaintiffs 1556-1609)				
P-34	Ashely Killough, Rosa Flores, and Ed Lavandera, A former prison warden and his brother face additional charges in the shooting of migrants in West Texas <sup>6</sup> , CNN (Oct. 7, 2022), <a href="https://www.cnn.com/2022/10/07/us/texas-brothers-sheppard-migrants-shooting">https://www.cnn.com/2022/10/07/us/texas-brothers-sheppard-migrants-shooting</a> (Plaintiffs 1634-1638)				
P-35	Letter (LaSalle 23)				
P-36	Jesús Ivan Sepúlveda Martínez Autopsy Report (Plaintiffs 1759-1788				

Plaintiffs reserve the right to use and refer to exhibits on Defendant's Exhibit List, as yet unknown.

Plaintiffs reserve the right to submit additional exhibits, the need for which cannot be reasonably anticipated at the present time, for purposes of rebuttal or impeachment, should the need arise.

Respectfully submitted,

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#### **CERTIFICATE OF SERVICE**

The undersigned counsel certifies that on August 14, 2025, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Christopher Benoit

Christopher Benoit